Mooney · Jones & Stokes

June 16, 2006

Ms. Shannon Turek
San Diego Gas & Electric
8315 Century Park Court
San Diego, CA 92123

Re: General Biological Survey and Letter Report for the Mountain Empire Operator Training Facility

Dear Ms. Turek,

Mooney • Jones & Stokes is pleased to provide this General Biological Survey and Letter Report for the Mountain Empire Operator Training Facility. The proposed project will establish an equipment operator training facility adjacent to and south of the San Diego Gas & Electric (SDG&E) Mountain Empire Office in the unincorporated community of Buckman Springs, San Diego County, California. This report contains data collected during biological surveys and through a search of the California Natural Data Diversity Database (CNDDB) and is intended to satisfy the County of San Diego's requirements for preparation of a Biological Letter Report in support of a Major Use Permit (MUP) modification. Impacts to vegetation communities and potential impacts to sensitive species and anticipated mitigation requirements are also discussed.

**SUMMARY**

The proposed project involves a modification to an existing MUP for the subject parcel. The modification proposes the establishment of an operator training area, an equipment storage area, an improved decomposed granite access road, and a student parking area adjacent to the existing Mountain Empire Facility located at 30763 Old Highway 80. The 19-acre parcel is located west of Interstate 8 and Old Highway 80 and north of Buckman Springs Road in the unincorporated community of Buckman Springs, San Diego County, California. SDG&E is proposing the establishment of a new training facility and associated support facilities on approximately 3.8 acres of the 19-acre parcel.

Biological surveys conducted for the project consisted of general surveys to map vegetation communities and to record plants and animals that occur on the parcel as well as a series of directed searches for arroyo toad (*Bufo californicus*), a federally endangered species known to occur in the project vicinity (CNDDB, 2005). Surveys for rare plants were also conducted on the parcel during daytime arroyo toad surveys. Vegetation communities present within the 19-acre parcel include granitic northern mixed chaparral, disturbed granitic northern mixed chaparral, southern coast live oak riparian forest, disturbed habitat, and developed lands. The proposed project would result in impacts to approximately 3.76 acres of granitic northern mixed chaparral and 0.04 acre of disturbed habitat. No sensitive species were detected on the parcel during the

9903 Businesspark Avenue
San Diego, CA 92131
Phone: (858) 578-8964 Fax: (858) 578-0573
www.jonesandstokes.com

surveys, however, the parcel provides suitable habitat for several non-listed sensitive species known to occur in the project vicinity and birds protected under the Migratory Bird Treaty Act (MBTA). Impacts to suitable habitat for sensitive species and removing nests of birds protected under the MBTA would be considered significant.

Proposed mitigation for impacts to a total of 3.76 acres of granitic northern mixed chaparral is the deduction of a total of 7.52 acres of mitigation credits from SDG&E's mitigation bank in conformance with SDG&E's Natural Communities Conservation Plan (NCCP). Impacts to 0.04 acre of disturbed habitat would not require mitigation. Impacts to suitable habitat for sensitive species that have the potential to occur on the parcel would be adequately mitigated through habitat-based mitigation. Vegetation removal shall be avoided during the breeding season for birds protected under the MBTA (February 1 and August 31) unless a qualified biologist determines that active nests will not be removed by this work. The project site does not provide suitable breeding or burrowing habitat for arroyo toad; potential foraging habitat is also poor due to the density of the vegetation on site. In order to ensure arroyo toads are not affected by the proposed project, toad exclusion fencing will be installed and maintained along the western side of the perimeter of the training area to prevent arroyo toads from entering the site. In addition, a pre-construction arroyo toad clearance survey will be conducted.

Jurisdictional resources located on the parcel consist of a segment of Cottonwood Creek that traverses the northwestern portion of the parcel and a small drainage feature that carries runoff from the existing developed area away from the parcel to the north and into Cottonwood Creek. Neither of these drainages would be affected by the proposed project. An additional small swale transports runoff from the existing developed area to the south. A portion of this feature would be realigned along the v-ditch and dirt berm along the northwest corner of the training yard as a result of the proposed project. This feature is characterized as a swale that originates as a concrete swale adjacent to the parking lot, draining through riprap, then continues as a swale to Buckman Springs Road, and was determined not to be regulated as a water of the U.S. during a site visit with U.S Army Corps of Engineers (USACE) staff. Therefore, it would not be regulated by the USACE or Regional Water Quality Control Board (RWQCB) under the federal Clean Water Act. Additionally, this area was determined to not meet the definition of a County Resource Protection Ordinance (RPO) wetland or a regulated streambed through coordination with County and California Department and Fish and Game (CDFG) staff, respectively.

## INTRODUCTION

The proposed 3.8-acre project site is on an approximately 19-acre parcel located at 30763 Old Highway 80 in the community of Buckman Springs, San Diego County, California (Figures 1 and 2). A portion of the parcel is currently developed and supports SDG&E's Mountain Empire Office. The remainder of the parcel is undeveloped and is dominated by granitic northern mixed chaparral. Cottonwood Creek also traverses the northwestern portion of the parcel, which is preserved within an open space easement that was recorded as a condition of the original MUP.

The parcel is bounded by undisturbed land on the north, disturbed habitat and Cottonwood Creek on the west, an agricultural field on the south and Old Highway 80 on the east.

The proposed project consists of the establishment of an equipment operator training area, equipment storage area, improved decomposed granite access road, and parking area on approximately 3.8 acres of the 19-acre parcel. The training area would consist of an approximately 450-foot by 300-foot area that would be routinely graded during training exercises that would occur three to four days per month on average. An equipment storage area and parking lot would be established adjacent to the training area; both areas would be graded and the parking area would be surfaced with decomposed granite. Access to the site would be from an existing unpaved access road off Old Highway 80. Improvement of the access road would involve widening the existing road bed to a maximum width of 15 feet, surfacing the road with decomposed granite and installing a 16-foot wide gate at the entrance to the road. The access road would extend approximately 265 feet from the existing entrance off Old Highway 80 to the proposed parking area. A bridge, possibly a pre-fabricated concrete slab bridge, would be installed over an existing concrete swale where the access road would cross the swale. The portion of the swale that traverses the proposed training area would be relocated to run along the edge of the training area in a v-ditch in the northwest corner of the training yard; an energy dissipater would be installed at the outlet of this swale to prevent erosion.

## METHODS AND SURVEY LIMITATIONS

Mooney • Jones & Stokes biologists K. Fischer, K. Hall and K. Klutz conducted a general survey of the 19-acre parcel on January 18, 2006 between the hours of 0900 and 1050. Conditions during the survey consisted of 51 degrees Fahrenheit with partly cloudy skies and winds gusting between 0 and 7 mph. The survey was conducted by slowly walking the entire parcel and recording plants and wildlife observed or detected. The purpose of the general survey was to evaluate whether any sensitive habitats, RPO wetland areas, or sensitive species exist or have the potential to occur on the parcel. Subsequent site visits were conducted by T. Lee of Mooney • Jones & Stokes and SDG&E staff with representatives from the USACE (April 4, 2006) and CDFG, USFWS and County of San Diego (May 23, 2006). The purpose of these site visits was to review the drainage areas and to scope issues associated with potential impacts to sensitive species. At the direction of SDG&E and through coordination with staff from the County and USFWS, Mooney • Jones & Stokes biologists conducted a series of directed daytime and nighttime surveys for arroyo toad. Arroyo toad surveys were conducted on May 16 (T. Lee), May 23 (T. Lee and K. Mozumder), May 30 (K. Klutz and A. Sartain) and June 6 (T. Lee and K. Mozumder). Surveys on the study parcel consisted of thorough inspection of Cottonwood Creek and adjacent upland areas on the SDG&E parcel. Adjacent sections of Cottonwood Creek were not included in the survey area because permission to survey the adjacent property, which is not owned by SDG&E, could not be obtained. However, the surveys included listening for calling arroyo toads from public roads up and downstream of the project parcel where Cottonwood Creek crosses Old Buckman Springs Road (0.3 miles upstream) and Buckman Springs Road (0.25 miles downstream). A search of the CNDDB (Laguna Mountain quadrangle) was also conducted to identify sensitive species previously documented in the vicinity of the project

parcel

SURVEY RESULTS

## Botany

The approximately 19-acre parcel is dominated by granitic northern mixed chaparral and southern coast live oak riparian forest (Figure 3). In addition, approximately 3.5 acres of the parcel is currently used as an office and storage yard facility. These developed areas consist of buildings, paved areas, fencing and associated landscaping. The vegetation communities occurring on the parcel are discussed in more detail below.

Granitic northern mixed chaparral is a vegetation community that is characterized by tall, broad-leaved shrubs typically measuring 2 to 4 meters in height, that occur in dry, rocky, often steep slopes with little soil depth. This vegetation community typically grows to form nearly impenetrable stands dominated by scrub oak (*Quercus berberidifolia*), chamise (*Adenostoma fasciculatum*), and one of several species of manzanita (*Arctostaphylos* spp.) or ceanothus (*Ceanothus* spp.). Dominant plants on the parcel consist of chamise, cup-leaf lilac (*Ceanothus greggii*), sugar bush (*Rhus ovata*) and big sagebrush (*Artemisia tridentata*).

Southern coast live oak riparian forest consists of open to dense riparian woodlands dominated by coast live oak. This habitat type occurs along Cottonwood Creek that traverses the northwestern parcel boundary. Dominant plants observed included coast live oak (*Quercus agrifolia*), western cottonwood (*Populus fremontii*) and willow species (*Salix* spp.). A complete list of plant species observed on the parcel is provided in Table 1.

**Table 1. Vascular Plant Species Observed at the SDG&E Mountain Empire Parcel**

| Scientific Name | Common Name |
|---|---|
| **CONIFERS** | |
| Cupressaceae - Cypress Family | |
| *Cypress* sp. | Cypress |
| **ANGIOSPERMS: DICOTS CANTHACEAE TO ANACARDIACEAE** | |
| **Anacardiaceae - Sumac or Cashew Family** | |
| *Rhus ovata* | Sugar bush |
| **Angiosperms: dicots asteraceae** | |
| **Asteraceae (Compositae) - Sunflower Family** | |
| *Acourtia microcephala* | Sacapellote |
| *Artemisia tridentata ssp. tridentata* | Big sagebrush |
| *Gnaphalium californicum* | California everlasting |
| *Gutierrezia californica* | California matchweed |
| **Brassicaceae (Cruciferae) - Mustard Family** | |
| **Brassica nigra* | Black mustard |
| **Cactaceae - Cactus Family** | |
| *Cylindropuntia californica var. parkeri* | Cane/valley cholla |
| *Opuntia sp.* | Prickly-pear |
| **Caprifoliaceae [incl. Adoxaceae] - Honeysuckle Family** | |

| Scientific Name | Common Name |
|---|---|
| *Sambucus mexicana* | Blue elderberry |
| **Ericaceae - Heath Family** | |
| *Arctostaphylos glauca* | Manzanita |
| **Fagaceae - Oak Family** | |
| *Quercus agrifolia var. agrifolia* | Coast live oak, encina |
| *Quercus berberidifolia* | Scrub oak |
| **Garryaceae - Silk Tassel Family** | |
| *Garrya veatchii* | Silk tassle |
| **Polygonaceae - Buckwheat Family** | |
| *Eriogonum fasciculatum var. fasciculatum* | California buckwheat |
| **Rhamnaceae - Buckthorn Family** | |
| *Ceanothus cuneatus var. cuneatus* | Buck brush |
| *Ceanothus greggii var. perplexans* | Cupleaf-lilac |
| **Rosaceae - Rose Family** | |
| *Adenostoma fasciculatum* | Chamise |
| *Adenostoma sparsifolium* | Red shank |
| *Cercocarpus betuloides var. betuloides* | Birch-leaf mountain-mahogany |
| **Salicaceae - Willow Family** | |
| *Populus fremontii ssp. fremontii* | Western cottonwood |
| **Scrophulariaceae - Figwort Family** | |
| *Penstemon spectabilis var. spectabilis* | Showy penstemon |
| **Tamaricaceae - Tamarisk Family** | |
| **Tamarix ramosissima* | Tamarisk, salt-cedar |
| **ANGIOSPERMS: MONCOTSAGAVACEAE TO ASPHODELACEAE** | |
| **Agavaceae - Agave Family** | |
| *Yucca schidigera* | Mohave yucca |
| *Hesperoyucca whipplei* | Our lord's candle |
| **Poaceae (Gramineae) - Grass Family** | |
| **Bromus hordeaceus* | Soft chess |
| **Bromus tectorum* | Cheat grass, downy brome |
| * Non-native plant species<br>Scientific and common names are from Hickman (1993) and Skinner and Pavlik (1994). Additional common plant names are taken from Abrams (1923, 1944), Abrams and Ferris (1960), Beauchamp (1986), McAuley (1996), Munz (1974), Raven (1986), Roberts (1989), and Sawyer and Wolf (1995). | |

## Wildlife

Thirteen bird species and three mammal species were detected or observed on the parcel. A complete list of species detected is provided in Table 2.

**Table 2. Wildlife Species Detected at the SDG&E Mountain Empire Project Parcel**

| Common Name | Scientific Name | Status |
|---|---|---|
| **BIRDS** | | |
| American kestrel | *Falco sparverius* | |
| Northern flicker | *Colaptes auratus* | |
| Black phoebe | *Sayornis nigricans* | |
| Steller's jay | *Cyanocitta stelleri* | |
| Western scrub jay | *Aphelocoma californica* | |
| Bushtit | *Psaltriparus minimus* | |
| Bewick's wren | *Thryomanes bewickii* | |
| Western bluebird | *Sialia mexicana* | -- |
| Spotted towhee | *Pipilo maculatus* | |
| California towhee | *Pipilo crissalis* | |
| White-crowned sparrow | *Zonotrichia leucophrys* | |
| Oregon junco | *Junco hyemalis thuberi* | |
| House finch | *Carpodacus mexicanus* | |
| **MAMMALS** | | |
| San Diego black-tailed jackrabbit | Lepus californicus bennettii | CDFG: CSC |
| Desert cottontail (sign) | Sylvilagus auduboni | |
| California ground squirrel (sign) | *Spermophilus beecheyi* | |

## Sensitive Species

Plant and wildlife species are considered sensitive if they have been listed as such by federal or state resource agencies or by special interest groups such as the California Native Plant Society (CNPS). The CDFG publishes the CNDDB Rarefind, a computerized inventory of information on the location and condition of California's rare, threatened, endangered and sensitive plants, wildlife and natural communities. This is a useful tool to assess the potential for sensitive species to occur in a particular area. A search of the CNDDB for the Laguna Mountain quadrangle was conducted to identify sensitive species historically documented within the quadrangle. The CNDDB search documented occurrences of the following sensitive vertebrate species in the project vicinity: arroyo toad, least Bell's vireo (*Vireo bellii pusillus*), fringed myotis (*Myotis thysanodes*), Townsend's big-eared bat (*Corynorhinus townsendii*), Dulzura pocket mouse (*Chaetodipus californicus femoralis*), San Diego horned lizard (*Phrynosoma coronatum (blainvillii)*), San Diego mountain kingsnake (*Lampropeltis zonata pulchra*), and two-striped garter snake (*Thamnophis hammondii*). The CNDDB search documented occurrences of the following sensitive plant species in the project vicinity: Laguna Mountains goldenbush (*Ericameria cuneata var. macrocephala*), sticky geraea (*Geraea viscida*), San Diego gumplant (*Grindelia hirsutula var. hallii*), San Diego sunflower (*Hulsea californica*), Mount Laguna aster (*Machaeranthera asteroides var. lagunensis*), San Bernardino aster (*Symphyotrichum defoliatum*), southern jewel-flower (*Streptanthus campestris*), Jacumba milk-vetch (*Astragalus douglasii var. perstrictus*), velvety false lupine (*Thermopsis californica var. semota*), Parish's meadowfoam (*Limnanthes gracilis ssp. parishii*), Cuyamaca larkspur

(*Delphinium hesperium ssp. cuyamacae*), Laguna Mountains alumroot (*Heuchera brevistaminea*), Dunn's mariposa lily (*Calochortus dunnii*), and San Bernardino blue grass (*Poa atropurpurea*). In addition, a list of sensitive species to be addressed in this report was provided by the County of San Diego. The species identified in the County's list and the CNDDB search and their potential to occur in the project area are included in Table 3.

**Table 3. Sensitive Species Potentially Occurring Within The Project Vicinity**

| Species | Status | Habitat | Presence/Description |
|---|---|---|---|
| **WILDLIFE** | | | |
| **Insects** | | | |
| **Birds** | | | |
| Western bluebird<br>*Sialia mexicana* | -- | Scattered trees, open forests, brush, and deserts. | One individual detected during field surveys. |
| **Reptiles and Amphibians** | | | |
| **Mammals** | | | |
| **PLANTS** | | | |
| Engelmann oak<br>*Quercus engelmannii* | CNPS list 4<br>County of San Diego Group D | Oak woodland, southern mixed chaparral, and savannah grasslands of the interior valleys and slopes. | Not detected during field surveys. Would have been easily detected if on site – no potential to occur. |

U.S. Fish and Wildlife Service (USFWS): FE= Federally Endangered, FT=Federally Threatened; California Department of Fish and Game (CDFG): SE= State Endangered, CSC= California Species of Concern, CFP= California Fully Protected; USDA Forest Service (FS); Bureau of Land Management (BLM); Western Bat Working Group (WBWG); MSCP= Multiple Species Conservation Plan target species, SDHS= San Diego Herpetological Society, BEPA= Bald and Golden Eagle Protection Act, CNPS= California Native Plant Society

## Sensitive Plants

No sensitive plants were detected during the surveys. Surveys were conducted during April, May and June, and rare plants would have been detected if they were present on site.

## Sensitive Wildlife

Sensitive wildlife species are discussed below.

Arroyo toad (*Bufo californicus*)
Federal Status: Endangered
State Status: Species of Special Concern

The arroyo toad was listed as an endangered species by the USFWS on 1/17/95, and is a CDFG

species of special concern. This toad occurs primarily west of the California desert areas from San Luis Obispo County to northwestern Baja California. It has been recorded from the Sweetwater, San Luis Rey, and San Diego rivers (Sloan 1964), as well as the San Dieguito, Santa Margarita, and San Luis Rey Rivers, and Cottonwood Creek (Jennings and Hayes 1994).

The arroyo toad breeds and forages along the edges of streams and rivers with shallow, gravelly pools adjacent to sandy terraces. Terraces must be stable and usually possess a moderately well-developed, scattered shrub and tree overstory typically containing mulefat, California sycamore, Fremont cottonwood, or coast live oak (Jennings and Hayes 1994). Eggs are deposited in shallow breeding pools less than one-foot deep with minimal current, little or no emergent vegetation, bordering vegetation set back such that most of the pool is open to the sky, and with sand or pea gravel substrate overlain with flocculent silt. Juveniles and adults retreat onto sandy terraces and burrow deeply into the sand to overwinter.

The arroyo toad is known to occur in Cottonwood Creek approximately two miles downstream of the project parcel (CNDDB 2005). No calling males were heard and no toads were observed during surveys of the parcel. The segment of Cottonwood Creek that occurs on the parcel is not suitable breeding habitat for arroyo toad because it is densely vegetated and has a steeply incised channel with swiftly flowing water. Arroyo toads are known to use upland areas within one kilometer of breeding sites; it was not determined whether breeding sites occur within one kilometer of the parcel because permission to survey the adjacent properties could not be obtained. Arroyo toads could potentially forage on the parcel if they occur in the project vicinity, however, the parcel is considered low quality for foraging due to the dense vegetation that occurs on site. The parcel is not suitable upland burrowing habitat for arroyo toads because the soils are not friable.

Western bluebird (*Sialia mexicana*)
Federal Status: None
State Status: None

The western bluebird is a stocky blue bird with a chestnut chest and is considered common in the foothills and mountains of San Diego County. It can usually be found in montane coniferous and oak woodlands and can also occur in areas with scattered trees, open forests, scrubs and during the winter in the desert (Unitt 2004).

One western bluebird was seen in an ornamental tree adjacent to the existing office building and outside the project footprint.

San Diego Black-tailed Jackrabbit (*Lepus californicus bennettii*)
Federal Status: None
State Status: Species of Special Concern

The San Diego black-tailed jackrabbit is a large, long legged hare, with distinctive long ears and a black tail. The black-tailed jackrabbit inhabits a wide range of habitats, including deserts, irrigated croplands, high mountains to 2,500 meters, and is commonly found in the western United States to Mexico and Baja California. The San Diego population is found mostly on the coastal side of our local mountains in open habitats, usually avoiding dense stands of chaparral or woodlands (Stephenson and Calcarone 1999).

A San Diego black-tailed jackrabbit was observed on the parcel. The chaparral onsite provides suitable habitat for the San Diego black-tailed jackrabbit.

**Jurisdictional Resources**

Jurisdictional resources located on the parcel consist of a segment of Cottonwood Creek that traverses the northwestern portion of the parcel and one 1-2 foot wide drainage that carries runoff from the existing developed area into Cottonwood Creek. The segment of Cottonwood Creek on the parcel consists of an approximately 6-foot wide channel that supports southern coast live oak riparian forest. Cottonwood Creek meets the definition of an RPO wetland and would also be regulated by the USACE, CDFG and RWQCB. The creek is within the open space easement and would not be impacted by the proposed project. No impacts would occur here.

The northern drainage that transports runoff from the existing developed area north into Cottonwood Creek was created as a result of prior development of the site. There is a cement brow ditch that directs runoff from the parking lot and into this approximately one to two foot wide channel. This channel does not support hydrophytic plant species and cuts through the granitic northern mixed chaparral. As this drainage was created from runoff that is directed from

the existing developed area and does not appear to be part of a natural drainage course, this feature would not meet the County's definition of a wetland as regulated by the RPO. However, as this feature does have a defined bed and bank and would be regulated as a non-wetland water of the U.S. by the USACE, a water of the state by the RWQCB, and a streambed by the CDFG. No impacts would occur here.

There is a southern drainage feature that transports runoff from the existing developed area south, across the southern portion of the parcel. A cement brow ditch directs the water away from the paved work yard and forms a small swale, approximately one to two feet wide, which finally exits the property at the southeastern corner. This swale does not support hydrophytic plant species and cuts through the granitic northern mixed chaparral. This swale was determined not to meet the definition of an RPO wetland through coordination with County staff. Additionally, it was determined not to be regulated as a water of the U.S. or water of the state through coordination with USACE and CDFG staff.

## ANTICIPATED PROJECT IMPACTS

### Habitats

Development of the proposed project would result in permanent impacts to approximately 3.76 acres of northern mixed chaparral (both disturbed and undisturbed) and 0.04 acre of disturbed habitat (Figure 4). Impacts to northern mixed chaparral would be considered significant and would require mitigation. Impacts to disturbed habitat would not be considered significant. Project impacts and anticipated mitigation requirements are presented in Table 4 below.

**Table 4. Project Impacts and Proposed Mitigation**

| Habitat Type | Permanent Impacts (acre) | Mitigation Ratio | Mitigation Acreage needed | How Mitigation Accomplished |
|---|---|---|---|---|
| Granitic Northern Mixed Chaparral | 3.76 | 2:1 | 7.52 | Deducting 7.52 acres of mitigation credits from SDG&E's mitigation bank |
| Disturbed Habitat | 0.04 | None | None | NA |
| **TOTAL** | **3.80** | **NA** | **7.52** | **Deducting 7.52 acres of mitigation credits from SDG&E's mitigation bank** |

### Rare and/or Endangered or Sensitive Species

No listed plants or animals were detected within the project footprint, but suitable habitat occurs on site for several sensitive wildlife species. Impacts to sensitive species would be potentially significant. Although there isn't suitable breeding or burrowing habitat on site for the arroyo toad, arroyo toads may occur in the vicinity of the project and individual toads could be killed during site grading if they disperse into the proposed training area.

Birds protected under the MBTA have the potential to nest within the shrubs located within the project footprint. No known raptor, or other bird, nest sites will be impacted by development of the proposed training facilities. However, removing vegetation during the breeding season of these species (February 1 and August 31) could result in loss of active nestsif nests become established within the impact area. Removal of active nests of birds protected under the MBTA would be considered significant.

Development of this proposed project would not preclude wildlife movement in the area. The parcel is surrounded by undisturbed habitat and therefore, development of a small portion of the parcel would not significantly effect wildlife movement in the vicinity.

**Jurisdictional Resources**

Impacts to RPO wetlands (i.e., Cottonwood Creek) or other regulated waters (small tributary to Cottonwood Creek) would not occur as a result of the proposed project. Cottonwood Creek is currently protected by an open space easement. The small swale on the southern portion of the site would not be regulated as an RPO wetland or other regulated water, so wetland permits are not required. Therefore, impacts to this feature would not be considered significant and would not require mitigation in addition to the habitat-based mitigation discussed below.

**MITIGATION MEASURES**Mitigation for impacts to a total of 3.76 acres of granitic northern mixed chaparral would be satisfied through deduction of 7.52 acres of mitigation credits from SDG&E's mitigation bankin accordance with SDG&E's NCCP. Impacts to 0.04 acre of disturbed habitat would not require mitigation. Potential impacts to sensitive species would be adequately mitigated through the proposed habitat-based mitigation. In order to avoid impacts to arroyo toads that could potentially disperse into the training area's footprint, arroyo toad exclusion fencing shall be installed and maintained along the western side of the perimeter of the training areas prior to disturbance. Additionally, arroyo toad clearance surveys shall be conducted prior to grading this area and all toads detected shall be relocated outside the training area.

To avoid impacts to bird species protected under the MBTA, removal of suitable nesting habitat (i.e., vegetation) should be done outside of the breeding season (February 1 through August 31). If vegetation removal must be done during the breeding season, pre-construction surveys shall be conducted by a qualified biologist to determine whether active nests occur within the impact area. If active nests are detected, vegetation removal should be avoided within a minimum of 50 feet (300 feet for raptors) of the nest until the young have fledged.

If you have any questions regarding the contents of this letter report, please contact Ted Lee at (858) 578-8964.

Respectfully Submitted,

Ted N. Lee
Senior Biologist

Korey Klutz
Senior Biologist

Attachments: Figure 1 - Regional Location Map
Figure 2 - Project Location
Figure 3 - Biological Resources Map
Figure 4 - Biological Resources and Impacts Map
Attachment A – Literature Cited

# ATTACHMENT A

# LITERAURE CITED

Abrams, L. 1923. *Illustrated Flora of the Pacific States, Volumes I-III*. Stanford University Press, Stanford, California.

Abrams, L. 1944. *Illustrated flora of the Pacific states. Volume 2. Polygonaceae to Krameriaceae.* Stanford University Press, Stanford, California. 635 pp.

Abrams, L. and R.S. Ferris. 1960. *Illustrated Flora of the Pacific States, Volume IV*. Stanford University Press, Stanford, California.

Beauchamp. R.M. 1986. *A Flora of San Diego County, California.* Sweetwater River Press.

California Department of Fish and Game (CDFG). 2005. *Special Plants List*. Natural Diversity Data Base. July.

California Natural Diversity Data Base (CNDDB). 2005. Database RareFind 3 Report.

Hickman, J. C., ed. 1993. *The Jepson Manual: Higher Plants of California*. University of California Press. Berkeley, California. 1400 pp.

Holland, R.F. 1986. *Preliminary Descriptions of the Terrestrial Natural Communities of California.* Nongame-Heritage Program, California Department of Fish and Game.

McAuley, M. 1996. *Wildflowers of the Santa Monica Mountains*. Canyon Publishing Company.

Munz, P.A. 1974. *A Flora of Southern California*. University of California Press, Berkeley, California.

Roberts, N.C.1989. *Baja California Plant Field Guide*. Natural History Publ. Co.U.S.A. 309p.

Sawyer, J.O. and T. Keeler-Wolf. 1995. *A Manual of California Vegetati*on. Sacramento, CA. California Native Plant Society. 471 p.

Skinner, M.W. and B.M. Pavlik. 1994. *California Native Plant Society's Inventory of Rare and Endangered Vascular Plants of California.* Special Publications No. 1. Fifth Edition. February.

Stephenson, J.R. and G.M. Calcarone. 1999. Southern California mountains and foothills assessment: Habitat and species conservation issues. General Technical Report GTR-PSW-175. Albany, CA: Pacific Southwest Research Station, Forest Service, U.S.

Department of Agriculture.

Unitt, P. 2004. *San Diego County Bird Atlas*. Proceedings of the San Diego Society of Natural History 39: i–vii, 1–639.